

LAW OFFICES
WILLIAMS & CONNOLLY LLP
725 TWELFTH STREET, N.W.

MARGARET A. KEELEY
(202) 434-5137
mkeeley@wc.com

WASHINGTON, D. C. 20005-5901
(202) 434-5000
FAX (202) 434-5029

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

August 4, 2003

Via Facsimile & First Class Mail

John M.G. Murphy, Esq.
Ober, Kaler, Grimes & Shriver
120 East Baltimore St.
Baltimore, MD 21202
Facsimile: (410) 547-0699

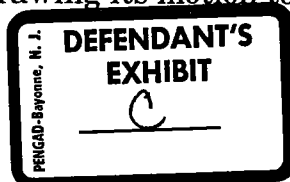
Re: KI v. WSC v. GSE

Dear John:

We write in response to your e-mail of July 30, 2003, stating that Professor Malkin will not be available to be deposed on Monday September 15, 2003. We already noted Professor Malkin's deposition to begin on this date after your office confirmed his availability. See July 18, 2003 e-mail from Jesse Hammock.¹ Thus, under the Local Rules, you must first coordinate new dates before changing the starting date for this deposition. See Appendix A, Discovery Guidelines of the United States District Court of Maryland, Guideline 4.

As we have stated before, we are willing to reschedule the depositions of Messrs. Malkin and Rakitin to September 16 through 20 if Kurchatov will pay the additional cost of conducting a Saturday deposition. My current understanding is that Kurchatov has rejected this accommodation, however, and thus the deposition continues to be noted for Monday, September 15, 2003.


¹ As you will no doubt recall, the confirmation of these five dates was also the predicate for Western withdrawing its motion to compel these depositions.



WILLIAMS & CONNOLLY LLP
John M.G. Murphy, Esq.
August 4, 2003
Page 2

Should Kurchatov wish to reconsider our offer, or propose alternative dates, we will certainly do our best to accommodate any reasonable request.

Sincerely,


Margaret A. Keeley

cc: Charles L. Simmons, Jr. Esq.